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***UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA***

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROBERT BROWN,

Defendant.

2:15-cr-00053-LRH-VCF

**STIPULATION TO CONTINUE
DEADLINE FOR GOVERNMENT'S
RESPONSE TO DEFENDANT'S MOTION
TO SUPPRESS (Doc #18)**

(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Alexandra Michael, Assistant United States Attorney, counsel for the United States of America, and Rachel Korenblat, counsel for Defendant ROBERT BROWN, that the deadline for Government's Response to Defendant's Motion to Suppress, currently set for June 17, 2015, Doc. #17, be vacated and continued for seven (7) days, until June 24, 2015, or to a date to be set at the Court's convenience.

This stipulation is entered into for the following reasons:

1. Government counsel requires additional time to prepare a Response to Defendant's Motion to Suppress.
2. The Defendant is in custody and defense counsel does not object to the continuance.
3. For the reasons stated above, the ends of justice would best be served by a continuance of the deadline.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

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2:15-cr-00053-LRH-VCF

FINDINGS OF FACT, CONCLUSIONS
OF LAW, AND ORDER

FINDINGS OF FACT

Based upon the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Government counsel requires additional time to prepare a Response to Defendant's Motion to Suppress.
2. The Defendant is in custody and defense counsel does not object to the continuance.
3. For the reasons stated above, the ends of justice would best be served by a continuance of the deadline.
4. Additionally, denial of this request for continuance could result in a miscarriage of justice.
5. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Sections 3161(h)(3)(A) and (h)(7)(A), considering the factors under Title 18, United States Code, Sections 3161(h)(7)(B)(i) and (h)(7)(B)(iv).

CONCLUSIONS OF LAW

The ends of justice served by granting said continuance outweigh the best interest of the public and the Defendant in a speedy trial, since the failure to grant said continuance would be likely

1 to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity
2 within which to be able to effectively and thoroughly prepare for trial, taking into account the
3 exercise of due diligence.

4 The continuance sought herein is excludable under the Speedy Trial Act, Title 18, United
5 States Code, Sections 3161(h)(1)(A), (h)(7)(A), (h)(7)(B)(i), and (h)(7)(B)(iv).

6 **ORDER**

7 IT IS THEREFORE ORDERED that the deadline for Government's Response to
8 Defendant's Motion to Suppress, currently scheduled for June 17, 2015, be vacated and continued
9 to the 24th day of June, 2015.

10 DATED this 11th day of June, 2015.

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13 HONORABLE CAM FERENBACH
14 UNITED STATES MAGISTRATE JUDGE
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